

## EXHIBIT C

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**From:** Sarah Burns  
**To:** [rice@bakersterchi.com](mailto:rice@bakersterchi.com); Optum Opioid Team; ESI-Opioids  
**Cc:** Jayne Conroy; Erin Dickinson; Paulina doAmaral; Justin Presnal; Jill Kraus  
**Subject:** RE: Cleveland County, NC - Request to Add to Motions for Leave to Amend (KVK-Tech and PBMs only)  
**Date:** Tuesday, September 24, 2024 9:45:00 AM

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Good morning,

Counsel for Cleveland County, NC intends to file its “Motion to Correct Inadvertent Omission and Join Omnibus Motions for Leave to Amend to Add KVK-Tech, Express Scripts, Inc., and OptumRx, Inc.” no later than close of business today. Please advise if we may represent in the motion that any or all of your respective clients do not oppose Cleveland County’s joinder in the respective Omnibus motions.

Thanks,

Sarah

Sarah Burns  
Simmons Hanly Conroy

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**From:** Sarah Burns  
**Sent:** Tuesday, September 17, 2024 4:11 PM  
**To:** rice@bakersterchi.com; Optum Opioid Team <[Optum.Opioid.Team@alston.com](mailto:Optum.Opioid.Team@alston.com)>; ESI-Opioids <[esi-opioids@quinnmanuel.com](mailto:esi-opioids@quinnmanuel.com)>  
**Cc:** Jayne Conroy <[jconroy@simmonsfirm.com](mailto:jconroy@simmonsfirm.com)>; Erin Dickinson <[ekd@cruegerdickinson.com](mailto:ekd@cruegerdickinson.com)>; Paulina doAmaral <[Pdoamaral@lchb.com](mailto:Pdoamaral@lchb.com)>  
**Subject:** RE: Cleveland County, NC - Request to Add to Motions for Leave to Amend (KVK-Tech and PBMs only)

Counsel for Optum, ESI, and KVK-Tech,

I've removed SM Cohen from this email. Would you be amenable to agreeing to add Cleveland County, NC to the respective motions for leave to amend?

We would very much appreciate the accommodation.

Thanks,

Sarah

Sarah Burns  
Simmons Hanly Conroy

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**From:** David R. Cohen ([David@SpecialMaster.Law](mailto:David@SpecialMaster.Law)) <[david@specialmaster.law](mailto:david@specialmaster.law)>  
**Sent:** Tuesday, September 17, 2024 3:37 PM  
**To:** Sarah Burns <[sburns@simmonsfirm.com](mailto:sburns@simmonsfirm.com)>  
**Cc:** rice@bakersterchi.com; Optum Opioid Team <[Optum.Opioid.Team@alston.com](mailto:Optum.Opioid.Team@alston.com)>; ESI-Opioids <[esi-opioids@quinnmanuel.com](mailto:esi-opioids@quinnmanuel.com)>  
**Subject:** Re: Cleveland County, NC - Request to Add to Motions for Leave to Amend (KVK-Tech and PBMs only)

**EXTERNAL:** Think before you click!

Hi, unless Ds agree to your request, this is an issue I do not have authority to rule upon unilaterally; you will have to file a formal motion. I told the same thing to Linda Singer regarding a similar request, you may want to coordinate.

-d

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This email sent from:

David R. Cohen Co. LPA  
24400 Chagrin Blvd., Suite 300  
Cleveland, OH 44122  
216-831-0001 tel  
866-357-3535 fax

[www.SpecialMaster.law](http://www.SpecialMaster.law)

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**From:** Sarah Burns <[sburns@simmonsfirm.com](mailto:sburns@simmonsfirm.com)>  
**Sent:** Tuesday, September 17, 2024 3:58 PM  
**To:** David R. Cohen ([David@SpecialMaster.Law](mailto:David@SpecialMaster.Law)) <[david@specialmaster.law](mailto:david@specialmaster.law)>  
**Cc:** [rice@bakersterchi.com](mailto:rice@bakersterchi.com) <[rice@bakersterchi.com](mailto:rice@bakersterchi.com)>; Optum Opioid Team <[Optum.Opioid.Team@alston.com](mailto:Optum.Opioid.Team@alston.com)>; ESI-Opioids <[esi-opioids@quinnemanuel.com](mailto:esi-opioids@quinnemanuel.com)>  
**Subject:** Cleveland County, NC - Request to Add to Motions for Leave to Amend (KVK-Tech and PBMs only)

Special Master Cohen (and all):

We write to ask for your leave to correct an error that inadvertently left Cleveland County, North Carolina off the list of jurisdictions seeking leave to amend its complaint to add **KVK-Tech, the Optum entities, and the Express Scripts entities.**

Cleveland County timely provided its authorization, which was conveyed by Simmons Hanly Conroy to the PEC on July 10<sup>th</sup>. However, in reviewing communications from the PEC on August 30, 2024, we noticed that Cleveland County was not included in the applicable motions for leave to amend due to inadvertent errors in filling out the authorization form. Cleveland County's is one of over 200 authorization forms submitted for Crueger Dickinson and Simmons Hanly Conroy clients. On September 3rd, we noticed the error and immediately informed the PEC to request a correction in the upcoming filing.

Please let us know if you have any questions. We regret the error and do not believe that the failure to include this single county prejudices any of the identified Defendants though it would significantly harm Cleveland County, which complied with the PEC's guidelines and deadlines.

Thank you for your consideration.

Kind regards,

Sarah

Sarah Burns  
Partner  
Simmons Hanly Conroy  
One Court Street  
Alton, IL 62002  
*and*  
231 Bemiston Ave Suite 525  
St. Louis, MO 63122  
T: (618) 259-2222 C: (314) 954-6302

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